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April 6, 2021

VIA ECF

The Honorable Loretta A. Preska
United States District Court
Southern District of New York
500 Pearl Street
New York, NY 10007

Re: ***Giuffre v. Dershowitz*, Case No. 19-cv-3377-LAP**
Permission To File Under Seal

Dear Judge Preska:

I write on behalf of Plaintiff Virginia Giuffre. Pursuant to Rule 1.A of Your Honor's Individual Practices, Plaintiff respectfully requests permission to file under seal her response to Defendant's pre-motion letter filed on April 2, 2021, seeking permission to move to compel the production of certain attorney-client communications (Doc. 274). In support of this request, we note that the Court granted Defendant leave to file his pre-motion letter under seal, *see* Doc. 266, and Plaintiff will both be responding to that sealed filing, as well as possibly attaching documents that have been designated as confidential under an applicable protective order.

In addition, we request permission to disclose and discuss Defendant's sealed pre-motion letter, together with its exhibits, with Plaintiff's prior counsel, on the ground that their communications would be the object of Defendant's motion to seal. In support of this request, Plaintiff notes that her prior counsel already have access to much of the confidential material attached to or discussed in Defendant's pre-motion letter, by virtue of their participation in *Giuffre v. Maxwell*, Case No. 15-cv-7433-LAP (S.D.N.Y.) and *Boies v. Dershowitz*, Index No. 160874/2019 (N.Y. Sup. Ct. N.Y. Cnty.).

Respectfully,

s/ Nicole Jo Moss
Nicole J. Moss

cc: Counsel of Record

Counsel's requests to file a response under seal and to discuss Defendant's pre-motion letter with Plaintiff's prior counsel are approved. SO ORDERED.

Loretta A. Preska 4/7/2021